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*Attorneys for Defendant Deutsche Bank National Trust Company, as Indenture Trustee under the Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-4*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

NEW START ASSET RECOVERY, LLC, a  
Nevada LLC,

Plaintiff,

vs.

STEPHEN R. USIAK and ROSA M. USIAK,  
husband and wife as Joint tenants; DEUTSCHE  
BANK NATIONAL TRUST COMPANY as  
Indenture Trustee under the Indenture Relating  
to JMH Assets, Corp Collateralized Asset-  
Backed Bonds, Series 2005-4, A New York  
Corporation; TRUSTEE CORPS, a California  
Company, Successor Trustee and DOES 1  
through 100, inclusive

Defendants.

Case No. 2:15-cv-01940-JAD-CWH

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEUTSCHE BANK  
TO FILE A RESPONSIVE PLEADING  
TO PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

Pursuant to Local Rules 6-1 and 26-4, Plaintiff New Star Asset Recovery, LLC (**Plaintiff**) and Defendant Deutsche Bank National Trust Company, as Indenture Trustee under the Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-4 (**Defendant** or **Deutsche**), submit this Stipulation to extend the time in which Defendant has to file a responsive pleading to Plaintiff's Complaint, filed on October 8, 2015. ECF No. 1. Plaintiff's Complaint sets

1 forth the following claims for relief: 1) Violation of the Fair Debt Collection Practices Act  
 2 (**FDCPA**); 2) NRS 116.3116(2); 3) Negligence; 4) Loss of Security due to bad securitization; 5)  
 3 Failure to submit claims to mediation pursuant to NRS 38.310(1)(a); and 6) Declaratory  
 4 Judgment/Quiet Title.

5 Pursuant to Stipulation of the parties, Defendant shall have up to and including December 1,  
 6 2015, to file a responsive pleading. This stipulation is in order to address current time constraints on  
 7 defense counsel.

8 DATED this 30<sup>th</sup> day of November, 2015

DATED this 30<sup>th</sup> day of November, 2015

9 **AKERMAN, LLP**

10 /s/ Eric S. Powers, Esq.

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18 *Attorneys for Defendant Deutsche Bank National*  
 19 *Trust Company, as Indenture Trustee under the*  
 20 *Indenture Relating to IMH Assets Corp.,*  
 21 *Collateralized Asset-Backed Bonds, Series 2005-4*

22 /s/ Philippe Laurent, Esq.

23 PHILIPPE LAURENT, Managing Member of  
 24 New Start Asset Recovery, LLC

25 7380 S. Eastern Avenue, Suite #124

26 Las Vegas, Nevada 89123

27 *Plaintiff Pro Se*

28 **ORDER**

IT IS SO ORDERED.

Dated December 2, 2015

  
 UNITED STATES MAGISTRATE JUDGE CARL W.  
 HOFFMAN